

# RUTHERFORD & CHRISTIE, LLP

NEW YORK

ATLANTA

February 22, 2008

Via Facsimile: (212) 805-6305  
Honorable Judge Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 735  
New York, New York 10007

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: FEB 25 2008
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Re: United National Insurance Company v. Blandford Construction Corp.,  
Christopher Lickman, and Ken Lickman  
U.S.D.C., Southern District of New York,  
Docket No.: 07-CV-10303 (PAC)  
R&C File No.: 512.008

*February 25, 2008*  
*The request for a 60 day extension is denied. Any motion to intervene in the underlying action must be made within the next 20 days - no motion answered is deemed ordered*  
*Paul Bluth*

Dear Judge Crotty:

We represent the plaintiff, 152 Wooster St. Corp., in an action pending in the Supreme Court of the State of New York, County of New York, captioned 152 Wooster St. Corp v. Tribeach Holdings LLC, et al., bearing Index Number 106005/2006 (referred herein as "the underlying action"). Blandford Construction Corp. is a defendant in the underlying action.

Blandford Construction Corp.'s insurance coverage in the underlying action is at issue in the matter before your Honor. United National Insurance Company has moved for a Default Judgment in the matter before your Honor for which responses are due on or before February 28, 2008. As my client, and possibly other parties in the underlying action, may be interested in requesting a leave of Court to intervene in the matter before your Honor, we respectfully request a sixty-day adjournment of United National Insurance Company's motion for Default Judgment in the above-referenced matter. Counsel for United National Insurance Company has refused to consent to the requested adjournment.

Thank you in advance, for your consideration of this request.

Respectfully submitted,

RUTHERFORD & CHRISTIE, LLP

By *Michael C. Becker*  
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MEMO ENDORSED

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cc: ***Via First Class Mail***  
Honorable Magistrate Judge Ronald L. Ellis  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1970  
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***Via Facsimile: (516) 741-7676***  
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